

# EXHIBIT A

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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA  
 MUNIZ, ELIZA CAMBAY, SAL  
 CATALDO, EMIR GOENAGA, JULIAN  
 SANTIAGO, HAROLD NYANJOM,  
 KELLIE NYANJOM, and SUSAN LYNN  
 HARVEY, individually and on behalf of all  
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**[PLAINTIFFS' PROPOSED] ORDER  
 REGARDING CLAWBACK DISPUTE**

The Honorable Alex G. Tse  
 Courtroom A – 15th Floor  
 Trial Date: Not Yet Set

**[PROPOSED] ORDER**

Before the Court is the parties' Joint Letter Brief regarding the parties' dispute over a document that Google has clawed back as privileged. ("Clawback Joint Letter Brief"). Having considered the Clawback Joint Letter Brief, reviewed the document *in camera*, and good cause having been shown, the Court orders as follows:

The document is not privileged. Google shall produce to Plaintiffs an unredacted version of the document within one day of this Order. Within one week of this Order, Google shall also produce any other "Privacy Design Documents" that are responsive to Plaintiffs' Requests for Production.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

Honorable Alex G. Tse  
United States Magistrate Judge